

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

AMERICAN PATENTS LLC,

*Plaintiff,*

v.

TELIT COMMUNICATIONS PLC AND  
TELIT WIRELESS SOLUTIONS HONG  
KONG LIMITED,

*Defendants.*

Civil Action No. 6:21-cv-01336-ADA

**DECLARATION OF KIT CHING LEUNG IN SUPPORT OF:**


**TELIT COMMUNICATIONS PLC'S AND TELIT WIRELESS  
SOLUTIONS HONG KONG LIMITED'S MOTION TO DISMISS FOR  
LACK OF PERSONAL JURISDICTION, OR IN THE ALTERNATIVE,  
FOR FAILURE TO STATE A CLAIM OF DIRECT OR INDIRECT  
INFRINGEMENT**

1. I, Kit Ching Leung, declare under penalty of perjury as follows:
2. I was employed by Telit Wireless Solutions Hong Kong Limited ("Telit HK") from February 2017 until September 2021. My title was Finance Controller. For personal reasons, in October 2021, I relocated to the UK, and my title changed to Business Finance Manager of Telit Communications Ltd.
3. I make this declaration based on my personal knowledge.
4. Telit HK is a Hong Kong business and is incorporated in Hong Kong.
5. Telit HK does not manufacture any product.
6. Telit HK does not have any employees, offices, bank accounts or agent for service, and does not own any real estate in Texas, or in the U.S.

7. Telit HK has not, and does not, import or export any product in or into the U.S.
8. Telit HK has no distributors in the U.S.
9. Telit HK does not offer to sell, ship or use any product in or into the U.S., and has not in the past.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

May 24, 2022

  
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